

## Val J. Albright

### Partner

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Val Albright helps clients involved in complex U.S. federal and state tax controversies, including administrative resolution and in litigation. Also, Val counsels clients regarding their existing operations and structure and assists with tax planning matters. Val's clients come from diverse industries, including oil and gas, oil field services, telecommunications, software, insurance, electronics, entertainment, consumer products, trucking, pharmaceutical, agriculture, food production and other industries, as well as high net worth individuals.

Val handles virtually any aspect of complex tax disputes involving the IRS, including:

- Civil examinations
- Criminal investigations
- Collection proceedings
- Protests before Appeals
- Requests for private letter rulings
- Requests for competent authority assistance
- Requests for bilateral and unilateral advance pricing agreements
- Trial and settlement of disputes before the courts and administrative bodies

Clients seek Val's experienced, high-value counsel as a tax controversy attorney on U.S. domestic and international tax issues, including transfer pricing, subpart F, other foreign entity, foreign tax credit, U.S. trade or business, permanent establishment, research tax credit, foreign tax credit, other tax credit, withholding tax, captive insurance, worthless stock loss, business expense, domestic production activities deduction, consolidated return, charitable deduction, conservation easement, tax exemption, partnership, valuation and family limited partnership, tax treaty, transportation and other excise tax, voluntary disclosure, IRS collection, tax penalty, procedural, tax litigation and other issues.

Throughout his career, Val has achieved multiple successes. Most recently, Val served as the lead trial counsel for Rent-A-Center in a large complex matter before the U.S. Tax Court involving captive insurance issues.

Prior to entering private practice in 1994, Val worked for the IRS Office of Chief Counsel in Chicago and Dallas, where he served in a variety of federal tax litigation and executive capacities. During his tenure as a federal tax attorney with the Office of Chief Counsel, Val was involved in the development, settlement of numerous corporate and individual federal tax cases involving diverse domestic and international tax issues, including transfer pricing, oil and gas and related issues.

## Awards and Recognition

- Selected by his peers for inclusion in *The Best Lawyers in America*® in the fields of Tax Law (2006-2024) and Litigation & Controversy – Tax (2011-2024)
- Recognized, *Chambers USA: America's Leading Lawyers for Business* in the field of Tax: Litigation (Texas) (2005 – 2013, 2016 – 2025)
- Selected for inclusion to the Texas Super Lawyers list in the field of Tax (2012, 2013)
- Recognized as “The Best Lawyers in Dallas” by *D Magazine* in the field of Tax: Litigation (2013, 2014)
- Peer review rated as AV Preeminent®, the highest performance rating in the Martindale-Hubbell® Peer Review Ratings™ system

## Affiliations

- Member, Taxation Section of the State Bar of Texas
- Former chair, Tax Controversy Committee of the State Bar of Texas
- Member, The Arkansas Bar
- Member, Taxation Section of the American Bar Association
- Member and former chair, Tax Section of the Dallas Bar Association

## Sectors

- [Oil & Gas](#)

## Practice Areas

- [Corporate](#)

## Education

- Southern Methodist University Dedman School of Law (LL.M., 1986)
  - Major: taxation
- University of Arkansas School of Law (J.D., high honors, 1977)
- University of Arkansas at Monticello (B.A., magna cum laude, 1971)

## Admissions



FOLEY & LARDNER LLP

- Arkansas State Courts
- Northern District of Texas
- Southern District of Texas
- Texas State Courts
- U.S. District Court for the Northern and Southern Districts of Texas
- U.S. Tax Court
- U.S. Court of Federal Claims
- U.S. Court of Appeals for the Fifth Circuit